

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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SHAKIRA LESLIE; and SHAMILL :
BURGOS; on behalf of themselves and all :
others similarly situated, :
:

Plaintiffs, :

v. :

CITY OF NEW YORK; KEECHANT SEWELL, :
Police Commissioner for the City of New York, in :
her official capacity; KENNETH COREY, Chief of :
Department for the New York City Police :
Department, in his official capacity; JAMES :
ESSIG, Chief of Detectives for the New York City :
Police Department, in his official capacity; :
EMANUEL KATRANAKIS, Deputy Chief in the :
Forensic Investigations Division of the New York :
City Police Department, in his official capacity; :
and DR. JASON GRAHAM, Acting Chief Medical :
Examiner for the City of New York, in his official :
capacity; :

Defendants. :

Case No. 1:22-CV-02305

NOTICE OF MOTION TO CERTIFY CLASS

PLEASE TAKE NOTICE that, pursuant to Rules 23(a) and (b)(2) of the Federal Rules of Civil Procedure, the plaintiffs will move this Court on a return date to be determined by the Court for an order certifying the following class: all people who have had or will have their DNA surreptitiously taken and analyzed by the defendants without consent and without a warrant or court order and maintained in the City's Suspect Index. The plaintiffs also request that plaintiffs' counsel be appointed to represent the certified class pursuant to Rule 23(g).

In support of this motion for class certification, the plaintiffs file the attached Memorandum of Law in Support of the Motion for Class Certification, and the Declaration of Philip Desgranges with supporting exhibits.

Dated: March 21, 2022
New York, N.Y.



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J. David Pollock
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